



**ACKNOWLEDGEMENT OF NOTIFICATION
OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)**

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• VAD000820514

LYNCHBURG FOUNDRY LYNCHBURG PLANT
DRAWER 411
LYNCHBURG

VA 24505

INSTALLATION ADDRESS

CONCORD ROAD LOWER BASIN
LYNCHBURG

VA 24505



COMMONWEALTH of VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY

James S. Gilmore, III
Governor

West Central Regional Office

3019 Peters Creek Road, Roanoke, Virginia 24019
Telephone (540) 562-6700, Fax (540) 526-6725
<http://www.deq.state.va.us>

Dennis H. Treacy
Director

John Paul Woodley, Jr.
Secretary of Natural Resources

Thomas L. Henderson
Regional Director

January 19, 1998

Mr. Pete Aldred
Internet Technical Services
939 Airport Road
Suite 200
Lynchburg VA 24502

RE: Response to DEQ's RCRA information request
Internet Foundry – Lower Basin Plant (formerly Lynchburg Foundry)
Concord Turnpike; Lynchburg VA 24506
EPA ID# VAD000820514

Dear Mr. Aldred:

The Department of Environmental Quality (DEQ or the Department) has received a letter dated November 16, 1998 from Ms. Sharon Newlon of Dickinson Wright PLLC. Ms. Newlon's response addressed issues and submitted documentation outlined in DEQ's letter dated September 23, 1998. The DEQ appreciates all efforts made by Internet Foundries and its representatives in obtaining the requested information.

Based upon the Department's review of the information submitted, the Department believes that Internet Foundries has provided enough information to address the areas of non-compliance discovered during the July 1995 inspection. These citations for the Lower Basin Plant will be considered as adequately addressed and henceforth closed.

The Department appreciates Internet's time regarding this matter. If you have any further questions, I can be reached at (540) 562-6819.

Sincerely,

Kimberly Batwinas

Kimberly Batwinas
Environmental Inspector Senior
Waste Compliance Division

c: Mr. Aziz Farahmand, DEQ-WCRO Environmental Program Manager
Ms. Claire Ballard, DEQ-OTA
West Central Regional Office Files



MEMORANDUM

Waste Compliance Division
West Central Regional Office

TO: File

FROM: Kimberly Batwinas, Environmental Inspector Senior *KB*

DATE: January 15, 1999

RE: Intermet Foundry - Lower Basin Plant (formerly Lynchburg Foundry)
Concord Turnpike, Lynchburg VA
EPA ID# VAD000820514

COPY: Aziz Farahmand, WCRO
Claire Ballard, OTA
Charlie Stitzer, HQ

This purpose of this memo is to remove violations from the Timely and Inappropriate list for the above facility. For this facility there are a total of two violations on the T&A list, and one outstanding/pending citation dated 08/20/98.

The facility responded to our 9/23/98 letter requesting information to address the outstanding issues. WCRO received their response on November 16, 1998. Upon review of the information, WCRO has decided that they adequately addressed the outstanding issues. Thus we are removing them from the T&A list.

If there are any question, please call me at (540) 562-6819.



COMMONWEALTH of VIRGINIA

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Dennis H. Treacy
Director

Thomas L. Henderson
Regional Director

October 15, 1998

Ms. Sharon Newlon
Dickinson Wright PLLC
500 Woodward Ave
Suite 4000
Detroit MI 48226

RE: Extension request for Internet Foundry - Lower Basin Plant (formerly Lynchburg Foundry)
Concord Turnpike; Lynchburg Virginia
EPA ID# VAD000820514

Dear Ms. Newlon:

As per our telephone conversation today, the Department of Environmental Quality (DEQ) received your request for a thirty (30) extension. This extension request is for Internet's response to my letter dated September 23, 1998.

As discussed and noted in your e-mail (also dated today), the additional time is to assist recovery of stored information regarding this site. The Department has reviewed your request and is granting a thirty (30) day extension. Please be advised that this extension will be for an additional thirty days from today, thus a response must be submitted by November 15, 1998.

Thank you for your communication on these issues. If you have any further questions, please do not hesitate to contact me at (540) 562-6819.

Sincerely,

A handwritten signature in cursive script that reads "Kimberly Batwinas".

Kimberly Batwinas
Environmental Inspector Senior
Waste Compliance Division

c: Aziz Farahmand, DEQ-WCRO
Claire Ballard, DEQ-OTA
WCRO Files



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Dennis H. Treacy
Director

Thomas L. Henderson
Regional Director

September 23, 1998

Mr. Pete Aldred
Intermet Technical Services
939 Airport Road
Suite 200
Lynchburg VA 24502

RE: Resource Conservation and Recovery Act (RCRA) Site Visit/Inspection on August 20, 1998
Intermet Foundry – Lower Basin Plant (formerly Lynchburg Foundry)
Concord Turnpike; Lynchburg VA 24506
EPA ID# VAD000820514

Dear Mr. Aldred:

This letter is to follow up on our telephone conversation held on August 24, 1998. As I informed you during that conversation, I drove by the above referenced site in order to observe the current status and operations of the facility. A review of the Department's files indicate that this facility is no longer in operation and has been dismantled.

As we also discussed during our conversation, this facility was cited violations of the Virginia Hazardous Waste Management Regulations (VHWMR) as a result of an inspection performed by Mr. Charles Williamson (formerly) of this office on July 26, 1995. The compliance evaluation inspection (CEI) report dated September 13, 1995 cited two areas of non-compliance; one for accumulation of hazardous wastes for greater than 90 days (in violation of VHWMR 6.4.E.1.e) and another for failure to obtain interim status and/or apply for a (storage) permit (in violation of VHWMR Parts IX, X, and XI).

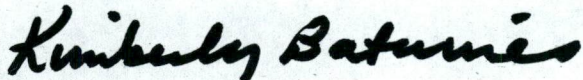
It was requested in Mr. Williamson's 9/13/95 report that a written response be submitted within thirty (30) days of receipt of his letter explaining what action(s) the facility will take to comply with the VHWMR. A written response by Intermet addressing these issues could not be found. In order to address these outstanding issues, the Department requests that Intermet provide any and all documentation and/or information related to this matter, to include and address the following:

- 1) A copy of the response submitted by Intermet in response to Mr. Williamson's inspection report, if applicable.
- 2) Documentation, information, and dates as to the hazardous waste determination, analytical testing, removal, and disposal of the baghouse dust observed at the green sand foundry baghouse contained within the trailer that was present on-site during the 7/26/95 inspection (as documented in the 9/13/95 CEI report)

- 3) The same as #2 above for the tractor trailer located/observed at the shell foundry baghouse
- 4) Same as #2 above for the waste dust inside the "heat exchanger/Recuperator"
- 5) Documentation of any waste shipments from this facility location since 6/25/98 (date of last documented hazardous waste shipment noted during 7/26/95 inspection). This shall include any hazardous wastes and/or baghouse dust shipments which may have been determined to be non-hazardous.
- 6) A current status report on the facility.

Please submit your response within twenty (20) days of receipt of this letter. I apologize for any confusion surrounding these issues, and I appreciate your extended cooperation with this matter. If you need a copy of the 9/13/95 inspection report or have any questions, please do not hesitate to call me at (540) 562-6819.

Sincerely,



Kimberly Batwinas
Environmental Inspector Senior
Waste Compliance Division

c: Mr. Aziz Farahmand, DEQ-WCRO Environmental Program Manager
Ms. Claire Ballard, DEQ-OTA
West Central Regional Office Files



MEMORANDUM

Waste Compliance Division
West Central Regional Office

TO: Claire Ballard, DEQ - Office of Technical Assistance
Charlie Stitzer

FROM: Kimberly Batwinas, Environmental Inspector Senior *KB*

DATE: September 25, 1998

RE: Intermet Foundry - Lower Basin Plant (formerly Lynchburg Foundry)
Concord Tpk; Lynchburg VA
EPA ID# VAD000820514
Timely and Appropriate Listing

COPY: WCRO Files
Aziz Farahmand, DEQ-WCRO

On August 20, 1998 I visited the above site to evaluate it's current operating status/perform an inspection, if possible. Review of WCRO files indicated that the facility has closed and has been dismantled. My visit confirmed this; the facility was not operating and has even sold some of its buildings on adjacent plots.

This facility is on the T&A for violations determined in 1991 and 1995 (see attached RCRIS forms). I spoke with Mr. Pete Aldred of Intermet Technical Services and he is aware of the outstanding issues from the 7/26/95 inspection and is working with me the resolve the issues (which, coincidentally, he thought were resolved with conversations with Mr. Williamson, the previous inspector. However, there is no documentation supporting Mr. Aldred's claim). Thus, the status of these two violations are still pending.

I could find no documentation for the two 1991 violations on the T&A. Researching the RCRIS database indicates that these violations were determined by an EPA Region 3 employee (R3THR). Additionally, there was a state inspection performed on 10/7/93 and no financial assurance violations were cited, thus they were in compliance for 1993. Due to these reasons, I am deleting the 9/30/91 violations.

If there are any questions, please call me at (540)562-6819 or e-mail me. Thanks



COMMONWEALTH of VIRGINIA

Peter W. Schmidt
Director

DEPARTMENT OF ENVIRONMENTAL QUALITY

Northern Regional Office
1549 Old Bridge Road, Suite 108
Woodbridge, Virginia 22192
(703) 490-8922

September 13, 1995

Mr. J. Peter Aldred, Manager Environmental Services
Intermet - Lynchburg Foundry Company
Lower Basin Plant
P.O. Box 11589
Lynchburg, VA 24506-1589

Subject: RCRA Compliance Evaluation Inspection (CEI), 7/26/95.
Lower Basin Plant, EPA I.D.# VAD000820514.

Dear Mr. Aldred:

A RCRA Compliance Evaluation Inspection (CEI) was conducted at your facility on July 26, 1995, by Charles B. Williamson, Environmental Engineer, Sr. of the DEQ West Central Regional Office Waste Division staff.

Copies of the checklists and memoranda completed as a result of this site visit are enclosed for your information and records.

The facility was not in compliance with the Virginia Hazardous Waste Management Regulations (VHWMR, VR-672-10-1). More specifically, the area(s) of non-compliance noted are as follows:

1. The facility accumulated (stored) hazardous waste in containers on-site for greater than 90 days in violation of VHWMR §6.4.E.1.e.
2. For storage in excess of 90 days (for large quantity generators) interim status or a TSD Permit is required. The facility failed to obtain interim status and/or apply for a (storage) permit. VHWMR Parts IX, X, AND XI.

Please respond in writing within 30 days of receipt of this letter explaining what action, or actions, the facility will take to attain compliance with the VHWMRs.

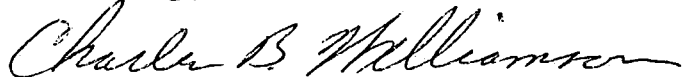
Intermet, Lower Basin Plant
VAD000820514.

As I advised you, I transferred to the DEQ Northern Regional Office in Woodbridge, VA August 16, 1995. Therefore your reply should be addressed to Mr. Norman Auldridge, Assistant Division Director, Compliance/Monitoring at the Roanoke office:

DEQ-WCRO-Waste Division
3035E Peters Creek Road
Roanoke, VA 24019
(540) 562-3555

I appreciate your cooperation during the inspection. If you find any discrepancies or have any questions about the report, please feel free to contact me at (703) 490-8922.

Sincerely,



Charles B. Williamson
Water Compliance Manager

Enclosures:

cc: DEQ-WCRO Files
Claire Slaughter, DEQ-OWRM

February, 1994

DEPARTMENT OF ENVIRONMENTAL QUALITY WASTE DIVISION

SURVEY SHEET FOR INSPECTION OF HAZARDOUS WASTE FACILITIES

NAME of FACILITY:	Intermet Corporation, Lynchburg Foundry, Lower Basin Facility
ADDRESS:	Lower Basin (Concord Turnpike), Lynchburg, VA P.O. Box 11589, Lynchburg, VA 24506-1589
EPA ID NUMBER:	VAD000820514
FACILITY REPRESENTATIVE:	J. Peter Aldred
TITLE:	Manager Environmental Services
TELEPHONE NUMBER:	(804) 528-8346 FAX (804) 528-8359
INSPECTOR'S NAME(s):	Charles B. Williamson
TITLE:	Environmental Engineer, Sr.
DATE of INSPECTION:	July 26, 1995

1	What is the business activity of the firm? (i.e., furniture mfg., metal plating, recycling, etc.) The facility is/was a metal casting foundry.
2	Give a brief description of the waste streams(s) [by chemical name, if possible] and hazardous waste code(s) generated by the firm. When the foundry facility was in operation, it primarily generated baghouse dust containing cadmium and lead (D006 and D008) characteristic wastes. Other hazardous wastes have been generated at this location due to the cessation of business and the demolition which is underway at this time. See the attached report and supporting materials for additional information.

3 List the highest amounts of hazardous waste ever generated in any month of the calendar year and the greatest amount ever accumulated at the site of each type of waste generated.		
Waste Code SEE ATTACHED SPREADSHEETS	Amount Generated SEE ATTACHED SPREADSHEETS	Amount Accumulated SEE ATTACHED SPREADSHEETS

4 Does the facility ever generate greater than: 1 kg. of acutely toxic waste (P listed waste or F020-F023 and F026-F027)?	NO
100 kg of clean-up from a spill of P listed waste or F020-F023 and F026-F027 waste? (If <u>yes</u> , then the facility is a large quantity generator.)	NO
5 How is the waste presently being handled? Where is it sent? (List all transporters and facilities, or on-site treatment performed). See attached information.	
6 Does the facility generate any hazardous waste that is excluded from regulation? (If yes, list the waste and the basis for exclusion.)	NO
7 Does the facility: Generate Market Burn used oil that is burned for energy recovery? (Underline or circle all that are applicable.) (If the facility <u>markets</u> or <u>burns</u> used oil, fill out the Used Oil Checklist .)	NO
Does the generator of used oil to be burned for energy recovery (other than a Conditionally Exempt Small Quantity Generator) mix the used oil with hazardous waste? (If YES, then fill out the Used Oil Checklist .)	NO
8 Does the facility generate any hazardous waste that is reclaimed that is reclaimed to recover economically feasible amounts of gold, silver, platinum, palladium, iridium, osmium, rhodium, ruthenium, or any combination of these? (If Yes, list the waste, where it is sent, and complete the Metals Recovery Checklist .)	NO

9 Does the facility generate, transport, store, collect or reclaim spent lead-acid batteries? (If yes, <u>Underline</u> or <u>circle</u> all that are applicable. If the facility stores batteries before reclaiming them, complete the Metals Recovery Checklist .)	NO		
10 Based on the above, the facility is a: <div style="margin-left: 40px;"> a. conditionally exempt small quantity generator b. small quantity generator c. generator d. permitted or interim status TSD e. unpermitted TSD (explain in comments section) See comments f. transporter g. other: please explain _____ </div> <div style="margin-left: 40px;">[Underline or Circle All That Are Applicable]</div>			
11 Check accumulation times and quantities for the three types of generators. (If the times or quantities are exceeded, then the facility is moved up to the next category. Complete the appropriate checklist(s).) <p>A conditionally exempt small quantity generator can accumulate for an indefinite period of time until he has accumulated 1000 kg (approx. 5-55-gallon drums) of non-acute hazardous waste, at which time the accumulation time (180 days or 270 days) for small quantity generators begin.</p> <p>Small quantity generators can accumulate hazardous waste for up to 180 days or 270 days if the disposal site is over 200 miles away (in containers and tanks <u>only</u>). However, if at any time over 6000 kgs of waste is accumulated, then the small quantity generator becomes a generator, or an unauthorized facility, as applicable.</p>			
12 List each container and tank accumulation area. Specify the number and capacity of each tank and container. [Note: Include any satellite accumulation areas. Verify that only 55 gallons of any particular hazardous waste code (or one quart of acutely toxic waste) is at that area.]			
LOCATION	# OF CONTAINERS	NUMBER OF TANKS	CAPACITY
See attached	See attached	NA	NA

13 Comments: The facility ceased operations in about December, 1993, and is in the process of demolishing the structures. Certain of the hazardous wastes have been stored on-site without a TSD Permit since that time. See the attached inspection narrative for additional details.

14 Waste Management Flow Diagram:

(On this page sketch a brief, but detailed, flow diagram that includes how and where the waste is generated, the steps through a treatment system (if any), the steps through storage including satellite accumulation areas. Do this for each waste stream including excluded hazardous waste. Include any wastewater treatment facilities at the company, and verify the type of units included in the system, and any hazardous waste streams going to WWT.)

No longer applicable.

MEMORANDUM

TO: INTERMET, LYNCHBURG FOUNDRY, LOWER BASIN FILE
DATE: SEPTEMBER 12, 1995
FROM: C.B. WILLIAMSON *C.B. Williamson*
RE: VAD000820514, CEI Report

On Wednesday, July 26, 1995, I conducted a RCRA Compliance Evaluation Inspection (CEI) at the Intermet Corporation, Lynchburg Foundry, Lower Basin Facility in Lynchburg, Virginia.

The facility is located in the Lower Basin area of the City of Lynchburg along the Concord Turnpike on the banks of the James River. The facility is a hazardous waste notifier, has been assigned EPA I.D. Number VAD000820514, and is listed as both a Large Quantity Generator (LQG) / Transporter (Trans) and a LQG / TSF depending on which data base print out one looks at.

The facility representative is Mr. J. Peter Aldred, Manager Environmental Services. The facility mailing address is: Intermet Foundries, Inc., P.O. Box 11589, Lynchburg, VA 24506-1589. The telephone number for Mr. Aldred is (804) 528-8346 and his facsimile number is (804) 528-8359.

When I scheduled the site visit with Mr. Aldred, he explained to me that the facility has ceased operations, has closed down, and is in the process of being demolished. He also informed me that there was no longer any power, lights, or water service to the facility.

Mr. Aldred met me at the facility at approximately 8:00 AM and guided me on a site tour. The following is a summary of our discussions and my observations during the tour:

The plant has been in operation on this site since 1896. It actually is/was composed of two (2) foundries - the shell foundry and the green sand foundry.

We started at the green sand foundry. The majority of the hazardous waste generated at the site was a characteristic baghouse dust containing cadmium (D006) and lead (D008). The green sand foundry ceased melting operations 12/31/93. The baghouse has been mostly cleaned out and only minor amounts of dust residue were present on the floors, walls and structural supports of the baghouse.

The baghouse hoppers were still labelled with the words "Hazardous Waste". Most of the dust had been shipped offsite for disposal (Horsehead Development) although a tractor trailer about 1/3 full of dust was still parked adjacent to the baghouse. The trailer bed was covered with a tarp. Miscellaneous metal scrap and debris (gaskets and pipe clamps) need to be removed from the dust before it could be shipped off-site.

The baghouse bags had been tested, came up non-hazardous, and were disposed of in the City of Lynchburg landfill.

Since the exterior wall material of the baghouse is an asbestos containing material, we had an extensive discussion of the demolition and disposal options. In my opinion, the interior of the baghouse met the definition of "empty" under the VHWMRs. Therefore, Mr. Aldred and I both felt that the structure could be dismantled (with proper asbestos cautions) and be disposed of as demolition wastes.

We then progressed through the plant to the shell foundry baghouse where the nearly identical conditions were observed, including the tractor trailer truck bed containing baghouse dust residues. The shell foundry ceased its melting operations on 9/15/94.

An additional area of discussion at the shell foundry was a unit known as the "Heat Exchanger/Recuperator". It is a large metal structure which I roughly estimated to be approximately 10' high by 10' wide by 40' long. It is nearly enclosed, has no manways or access ports and contains a large amount of tubing which will have to be removed in order to remove the hazardous waste dust inside the structure, the tubing, and ultimately the shell of the structure itself. We discussed the obvious difficulties of removing the hazardous waste and a portion of the coils in a confined space situation.

Mr. Aldred noted that there was a UST removal at the Lower Basin site. Since the UST was located in a vault, no samples were taken as no evidence of spillage was observed.

Some 250 asbestos samples were taken around the site. Surprisingly little asbestos was found. That which was found is mostly Class 1, non-friable material.

Another area of DEQ concern is the "Heat Treat" area where a petroleum contamination problem was found and is to be remediated. A Site Characterization Report (SCR) is due to be submitted to David Miles, WCRO, Water Division by 8/31/95. Mr. Aldred indicated that there are several test wells in the

Printed September 13, 1995
VAD000820514

impacted area that are tested weekly. Free product was observed in one of these wells.

No hazardous wastes other than the dust in the two (2) trailers by the bag houses were noted during the inspection tour.

We noted that the primary issue noted at the site was the length of storage of the characteristic hazardous waste dust at the three locations (two bag houses and the recuperator). That material has been stored on-site since the cessation of operations - 12/31/93 and 9/15/94.

The only employees on the site at the time of the inspection were two (2) wastewater treatment plant operators and the demolition project manager, Mr. Roy Staples. Mr. Staples has a cellular phone on-site for emergency communication and most of the subcontractors do also. All subs are required to have OSHA site safety training before they come on the site. Mr. Aldred noted that there is also one telephone still in operation at the wastewater treatment plant. The Lynchburg Police Department has a list of company contact names and phone number for use in emergencies. A copy of that list (dated June 20, 1995) was provided and is attached to this memo.

There was a small fire at the Lower Basin facility on July 20/21.

The contingency plan was not available at Lower Basin and no signage was readily noticeable for emergency procedures.

Mr. Aldred noted that the plant records are in a state of flux as part of them are at the Lower Basin office and part are at the Archer Creek facility. We proceeded from the plant site to the former office building where we picked up the manifest records and then drove over to the Archer Creek facility where power and light was available.

At Archer Creek I conducted a record review. Manifest records for 1993, 1994 and 1995 were reviewed. Notes from the manifest review are summarized in the worksheets attached to this report.

Mr. Aldred agreed to try and locate the most current version of the Contingency Plan to verify the name of the primary emergency coordinator.

The facility was listed as a transporter due to former activities when the baghouse dust was transported by the company. That activity stopped some time ago. The company is no longer a

transporter.

SUMMARY AND CONCLUSIONS

1. The facility was, and still is, a Large Quantity Generator.
2. Hazardous waste has been stored on-site in or near the bag houses for periods well in excess of 90 days without a storage permit.
3. Since the facility has ceased operations, has no significant workforce on-site, and is in the process of being demolished, the applicability of the VHWMR requirements regarding employee training records, Contingency Plans, inspection logs, etc., is open for discussion.
4. The facility is not a transporter of hazardous waste.

Attachments:

MEMORANDUM

TO: INTERMET, LYNCHBURG FOUNDRY, LOWER BASIN FILE
DATE: SEPTEMBER 12, 1995
FROM: C.B. WILLIAMSON *C.B. Williamson*
RE: VAD000820514, CEI

The following is a list of the transporters and TSD facilities noted from the 1994 and 1995 manifest records during a CEI at the subject facility conducted on July 26, 1995, by this author:

<u>Transporters:</u>	<u>EPA I.D. No.</u>
Chem Tran Inc	NDD981739667
J.B. Hunt Special Commodities	ARD981908551
Laidlaw	MDD980554653
Env. Trans Service	NCD000648451
J.S. Bryant	VAD988200317
<u>TSD's</u>	<u>EPA I.D. No.</u>
Laidlaw Environmental Service Reidesville, NC 27320	NCD000648451
Horsehead Resource Development Co. West Baldwin Street Rockwood, TN 37845 (615) 354-0955	TND982144099
Southeastern Chem & Solv. 755 Industrial Road Sumter, SC 29150	SCD036275626

MEMORANDUM

TO: INTERMET, LYNCHBURG FOUNDRY, LOWER BASIN FILE
DATE: SEPTEMBER 12, 1995
FROM: C.B. WILLIAMSON
RE: VAD000820514, CEI

The following is a list of the transporters and TSD facilities noted from the 1994 and 1995 manifest records during a CEI at the subject facility conducted on July 26, 1995, by this author:

<u>Transporters:</u>	<u>EPA I.D. No.</u>
Chem Tran Inc	NDD981739667
J.B. Hunt Special Commodities	ARD981908551
Laidlaw	MDD980554653
Env. Trans Service	NCD000648451
J.S. Bryant	VAD988200317
<u>TSD's</u>	<u>EPA I.D. No.</u>
Laidlaw Environmental Service Reidesville, NC 27320	NCD000648451
Horsehead Resource Development Co. West Baldwin Street Rockwood, TN 37845 (615) 354-0955	TND982144099
Southeastern Chem & Solv. 755 Industrial Road Sumter, SC 29150	SCD036275626

FILE NAME: B:\flwrbsn.wk1
 DATE: SEPTEMBER 12, 1995
 CREATED BY: C.B. WILLIAMSON
 REVISED: 9/13/95

THE FOLLOWING IS A COMPILATION OF THE INFORMATION RECEIVED ON JULY 26, 1995
 FROM J. PETER ALDRED, MANAGER ENVIRONMENTAL SERVICES, INTERMET CORPORATION,
 LYNCHBURG FOUNDRIES, DURING A COMPLIANCE EVALUATION INSPECTION (CEI).

1994 MANIFEST RECORDS

MANIFEST #	DATE	VOL.	UNIT	WGT (LBS)	WGT KG	DESCRIPTION
94049	02/28/94	454	LB	454	206	D001 - TRIETHYLAMINE
94049	02/28/94	885	LB	885	402	F002 - TCA
94049	02/28/94	506	LB	506	230	D001/D007 - PETROLEUM NAPTHA
	FEB	1,845		1,845	839	
94113	04/14/94	3,323	LB	3,323	1,510	F003 - XYLENE & COAL TAR NAPTHA
94113	04/14/94	515	LB	515	234	F003/D001 - XYLENE & CUMEN
94113	04/14/94	1,335	LB	1,335	607	D001/D007 - PETROLEUM NAPTHA
	APR	5,173		5,173	2,351	
94141	05/04/94	100	LB	100	45	F003 - XYLENE & CUMEN
94141	05/04/94	612	LB	612	278	F003 - XYLENE & CUMEN
	MAY	712		712	324	
94220	06/30/94	55	GAL	550	250	F002 - TCA
	JUN	55		550	250	
62895	06/28/95	200	LB	200	91	D001 - WASTE PICRIC ACID, WET - WASTE CODE????
	JUN	55		550	250	
BAGHOUSE DUST SHIPMENTS						
31213	12/13/93	33,980	LB	33,980	15,445	D006/D008 BAGHOUSE DUST
31203	12/02/93	31,660	LB	31,660	14,391	D006/D008 BAGHOUSE DUST
31129	11/29/93	30,080	LB	30,080	13,673	D006/D008 BAGHOUSE DUST
31115	11/15/93	34,740	LB	34,740	15,791	D006/D008 BAGHOUSE DUST
31112	11/12/93	33,000	LB	33,000	15,000	D006/D008 BAGHOUSE DUST
31029	10/29/93	37,140	LB	37,140	16,882	D006/D008 BAGHOUSE DUST

C.B.W.



COMMONWEALTH of VIRGINIA

RICHARD N. BURTON
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

(804) 225-2667
TDD (804) 371-8737

NOV 17 1993

Ms. Christel E. Ackerman
Environmental Engineer
Intermet Foundries, Inc.
Lynchburg Foundry Company-Lower Basin Plant
P. O. Box 6200
Lynchburg, Va 24505

Re: RCRA Compliance Review
EPA ID #VAD000820514

Dear Ms. Ackerman:

Thank you for your letter of November 8, 1993.

You provided the corrective actions taken for the two areas of non-compliance that were found during the inspection at your facility on October 7, 1993.

Our review has determined that the issues have been satisfactorily addressed. Therefore, your facility is now in compliance with the Virginia Hazardous Waste Management Regulations.

We still have not received from you a copy of the EPA letter concerning the regulatory status of baghouse hoppers, as requested in our letter of October 20, 1993. We would appreciate very much if you can send the information to us.

If you have any questions, please call me at (804) 371-0126 or Mr. Glenn Moore at (804) 225-2862.

Sincerely,

A handwritten signature in cursive script, reading "Yen T. Bao".

Yen T. Bao
Analytical Chemist
Office of Waste Resource Management
Waste Division

cc: G. E. Moore
Claire Slaughter

Claire GEN



COMMONWEALTH of VIRGINIA

RICHARD N. BURTON
DIRECTOR

DEPARTMENT OF ENVIRONMENTAL QUALITY

(804) 225-2667
TDD (804) 371-8737

OCT 20 1993

Ms. Christel E. Ackerman
Environmental Engineer
Intermet Foundries, Inc.
Lynchburg Foundry Company-Lower Basin Plant
P. O. Box 6200
Lynchburg, Va 24505

Re: RCRA Compliance Inspection
EPA ID #VAD000820514

Dear Ms. Ackerman:

Thank you very much for your cooperation during the Hazardous Waste Management Compliance inspection conducted on October 7, 1993, at Lynchburg Foundry Company, Lower Basin Plant, located at Garnet Street and Concord Turnpike, Lynchburg.

It was found that your facility was not in total compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). Instances of non-compliance are noted on the enclosed checklists and discussed below:

1. There were two manifests each with the same number 30920 and 30721. It was found that the facility numbering system for the manifests is based on the date of shipment. Therefore, if there were two shipments on the same date, then the two manifests will have the same number. The system has to be modified because each manifest number should be unique per section 5.3.B.2. of the VHWMR.
2. The inspection log indicated that the containers were not inspected at least weekly, for example, there were no inspection between 3/11/93 and 3/25/93, 6/15/93 and 6/29/93, 9/1/93 and 9/17/93.... This is a violation of section 9.8.E. of the VHWMR.

Other issues which were discussed during the inspection were:

- It was noted that the paint related waste as well as the triethylamine waste (D001/D009) from the Shell Finishing facility (Route 726 Mt. Athos Rd, Lynchburg) were still being shipped under the Archer Creek Plant ID number VAD000820506 as recently as 4/16/93. This is not a problem because the facility is contiguous with the Archer Creek Plant. However, the records for these shipments were combined with the Lower Basin Plant records and the

amounts were also included in the 1992 annual report of the Lower Basin Plant. The company had desired to keep the hazardous waste from the Shell Finishing Plant separate from the Archer Creek Plant and had applied for an ID number for the former as a Small Quantity Generator. The ID number VAD988222949 was issued on 12/03/92. Please use this ID number to avoid confusion and possible violation of section 6.5. of the VHWMR on Recordkeeping and Reporting.

- The facility contends that the baghouse hoppers are not tanks while the Department has maintained that they are. In the facility statement (Attachment 2), it was implied that EPA Region III had decided for the facility that the hoppers are not tanks. Please send us a copy of the EPA letter which states this decision. In any case, as the hoppers have a "Hazardous Material" label and are inspected daily and properly maintained (per facility statement, Attachment 2), they are considered to be in compliance with section 9.9.F. of the VHWMR.

- It is recommended that the Virginia Department of Emergency Services and the Local Emergency Planning Commission be included in the list of agencies receiving the facility contingency plan to provide assistance in case of emergency.

Please take corrective actions for violations 1 and 2 and provide documentation within 30-day of receipt of this letter to bring your facility back to compliance with the VHWMR. If you have questions, please call me at (804) 371-0126.

Sincerely,

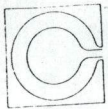


Yen T. Bao
Analytical Chemist
Office of Waste Resource Management
Waste Division

Enclosures

CC: G. E. Moore, OCE
C. Slaughter, OCE

Subsequent



INTERMET

INTERMET FOUNDRIES, INC.
P.O. Box 6200
Lynchburg, Virginia 24505
(804) 528-8200

RECEIVED
NOV 12 1992
VA DEPT OF
WATER RESOURCES
MAIL ROOM

November 9, 1992

Mr. Mohammed Habibi
Area Manager Compliance and Enforcement
Monroe Building, 11th Floor
101 N. Fourteenth Street
Richmond, VA 23219

Re: Intermet Foundries Inc., Generator Checklist

Dear Mr. Habibi,

Enclosed are Generator Checklists for three of Intermet Foundries Inc. Virginia plants. This checklist describes current hazardous waste activities at the following plants:

Lynchburg Foundry Co., Lower Basin Plant
*Lynchburg Foundry Co., Radford Shell Plant
New River Castings Company

If you have any questions or require additional information, please contact me at 804/528-8374.

Sincerely,


Christel E. Ackerman
Environmental Engineer

cc. J. Cartwright, Lower Basin
V. Clark, Radford Shell
B. McCombs, New River

RECEIVED
GENERAL STATE SECTION
JAN 13 1993
EPA, R3

NOV 12 1992

GENERATOR CHECKLIST

VAD000820514

FACILITY NAME Intermet Foundries Inc., Lynchburg Foundry Co.
ADDRESS Lower Basin Plant, Garnet Street & Concord Tnpk
Lynchburg, VA 24505

CONTACT NAME Christel E. Ackerman, Env. Engineer

CONTACT SIGNATURE Christel E. Ackerman

** Was Now
Now hq6*
XX

YES, my facility should be classified as a Large Quantity Generator (LQG) and has submitted its' annual report to the EPA/Department of Waste Management.

 YES, my facility should be classified as a Large Quantity Generator (LQG) and has not submitted an annual report to the EPA/Department of Waste Management.

 NO, my facility should not be classified as a Large Quantity Generator. I have completed the attached notification to change my generator status.

ADDITIONAL COMMENTS:

Production process modification enacted July 1992 and presently undergoing calibration will render melt furnace generated dry ash non-hazardous, as defined by VR 672-10-1, once fully operational.

This process modification, in conjunction with other hazardous waste minimization activities currently under investigation, will potentially result in Lower Basin Plant being reclassified as a Small Quantity Generator in the near future.

RECEIVED
GENERAL STATE SECTION

JAN 13 1993

EPA, RJ

Please refer to the instructions for Filing Notification before completing this form. The information requested here is required by law (Section 3010 of the Resource Conservation and Recovery Act).



Notification of Regulated Waste Activity

United States Environmental Protection Agency

SEP 8 1993
Date Received
(For Official Use Only)
SEP 10 1993
SEP 31 1993

I. Installation's EPA ID Number (Mark 'X' in the appropriate box).

☐

A. First Notification

☒

B. Subsequent Notification

(complete item C)

C. Installation's EPA ID Number

V A D 0 0 0 8 2 0 5 1 4

II. Name of Installation (Include company and specific site name)

L Y N C H B U R G F O U N D R Y - L O W E R B A S I N

III. Location of Installation (Physical address not P.O. Box or Route Number)

G A R N E T S T. E C O N C O R D T U R N P I K E

Street (continued)

C i t y o r T o w n S t a t e Z I P C o d e
L Y N C H B U R G V A 2 4 5 0 5 -

C o u n t y C o d e C o u n t y N a m e

N A

IV. Installation Mailing Address (See instructions)

Street or P.O. Box

RECEIVED
GENERAL STATE SECTION

P O B O X 6 2 0 0

C i t y o r T o w n S t a t e Z I P C o d e
L Y N C H B U R G V A 2 4 5 0 5 -

V. Installation Contact (Person to be contacted regarding this site)

N a m e (L a s t) F i r s t
A C K E R M A N C H R I S T E L

J o b T i t l e P h o n e N u m b e r (a r e a c o d e a n d n u m b e r)
E N V. E N G I N E E R 8 0 4 - 5 2 8 - 8 3 7 4

VI. Installation Contact Address (See instructions)

A. Contact Address B. Street or P.O. Box

☐
☒

N A

C i t y o r T o w n S t a t e Z I P C o d e

VII. Ownership (See instructions)

A. Name of Installation's Legal Owner

I N T E R M E T F O U N D R I E S I N C

Street, P.O. Box or Route Number

P O B O X 6 2 0 0

C i t y o r T o w n S t a t e Z I P C o d e
L Y N C H B U R G V A 2 4 5 0 5 -

P h o n e N u m b e r (a r e a c o d e a n d n u m b e r) S i g n a t u r e (Date Changed) Month Day Year
8 0 4 - 5 2 8 - 8 2 0 0 P P X

ID - For Official Use Only

VIII. Type of Regulated Waste Activity (Mark 'X' in the appropriate boxes. Refer to instructions.)

A. Hazardous Waste Activity

B. Used Oil Fuel Activities

1. Generator (See Instructions)
- ☒ a. Greater than 1000kg/mo (2,200 lbs.)
- ☐ b. 100 to 1000 kg/mo (220 - 2,200 lbs.)
- ☐ c. Less than 100 kg/mo (220 lbs.)
2. Transporter (Indicate Mode in boxes 1-5 below)
- ☐ a. For own waste only
- ☐ b. For commercial purposes
- Mode of Transportation
- ☐ 1. Air
- ☐ 2. Rail
- ☐ 3. Highway
- ☐ 4. Water
- ☐ 5. Other - specify _____
3. Treater, Storer, Disposer (at installation)
- Note: A permit is required for this activity. See instructions.
4. Hazardous Waste Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketers
- ☐ c. Burner - Indicate device(s) - Type of Combustion Device
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
5. Underground Injection Control

1. Off-Specification Used Oil Fuel
- ☐ a. Generator Marketing to Burner
- ☐ b. Other Marketer
- ☐ c. Burner - Indicate device(s) - Type of Combustion Device
- ☐ 1. Utility Boiler
- ☐ 2. Industrial Boiler
- ☐ 3. Industrial Furnace
2. Specification Used Oil Fuel Marketer (or On-site Burner) Who First Claims the Oil Meets the Specification
- ☐

IX. Description of Regulated Wastes (Use additional sheets if necessary)

A. Characteristics of Nonlisted Hazardous Wastes. Mark 'X' in the boxes corresponding to the characteristics of nonlisted hazardous wastes your installation handles. (See 40 CFR Parts 261.20 - 261.24)

1. Ignitable (D001) ☐ 2. Corrosive (D002) ☐ 3. Reactive (D003) ☐ 4. Toxicity Characteristic (D000) ☒
- (List specific EPA hazardous waste number(s) for the Toxicity Characteristic contaminant(s))
- D005 ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐ ☐

B. Listed Hazardous Wastes. (See 40 CFR 261.31 - 33. See instructions if you need to list more than 12 waste codes.)

1 NA	2	3	4	5	6
7	8	9	10	11	12

C. Other Wastes. (State or other wastes requiring an I.D. number. See instructions.)

1 NA	2	3	4	5	6
---------	---	---	---	---	---

X. Certification

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

Signature

Name and Official Title (Type or print)

Date Signed

J.M. CARTWRIGHT, GENERAL MANAGER

7-31-92

XI. Comments

NOTIFICATION IN REFERENCE TO D005/D001 CHARACTERISTIC WASTE GENERATED BY METAL CASTING RUST PREVENTATIVE.

Note: Mail completed form to the appropriate EPA Regional Office. See Section II of the booklet for address.



ACKNOWLEDGEMENT OF NOTIFICATION
OF REGULATED WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Regulated Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

+

VAD000820514

INSTALLATION ADDRESS

LYNCHBURG FOUNDRY LOWER BASIN
GARNET ST & CONCORD TURNPIKE
LYNCHBURG , VA 24505
CHRISTEL ACKERMAN ENV ENGR

GARNET ST & CONCORD TURNPIKE
LYNCHBURG , VA 24505



COMMONWEALTH of VIRGINIA

DEPARTMENT OF WASTE MANAGEMENT

11th Floor, Monroe Building

101 N. 14th Street

Richmond, VA 23219

(804) 225-2667

MAY 7 1991

Certified-Return
Receipt Requested

J. Peter Aldred, Environmental Engineer
Intermet Foundries, Inc.
P. O. Box 6200
Lynchburg, Virginia 24505

GEN

Re: VAD0008205142, Compliance Inspection of Lynchburg Foundry
Company Lower Basin Facility's Transporter Permit

Dear Mr. Aldred:

During a recent (3-18-91) inspection made by the Department, it was noted that your facility was not in compliance with the Virginia Hazardous Waste Management Regulations (VHWMR). Such instances are indicated by checkmarks on the enclosed checklists and are listed below:

1. The transporters permit (VAD0008205142) was issued to the Lynchburg Foundry Company. The VHWMR § 7.3.E.2. states that whenever a transporter changes his corporate name, ownership and or EPA identification number, he shall notify the Department of Waste management within 30 days of such a change. The Department has no record which shows that the name was ever changed to Intermet Foundries, Inc. It appears that your facility has been transporting hazardous waste without a valid transporters permit. Proceeding to revoke your Transporters permit will begin immediately as provided in VHWMR § 7.3.E.1.

We will issue a transporter permit reflecting the new corporation name, if you apply for a transporter permit immediately as Intermet Foundries, Inc. You can find a copy of the application in Part VII of the VHWMR. Please note that the appropriate fee (\$ 80) must be included with the application.

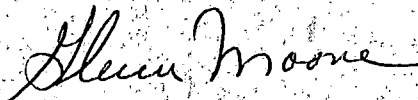
During the inspection, you indicated that the baghouse dust was transported off-site using the proper manifest to Lynchburg Foundry's Archer Creek facility for treatment.

J. Peter Aldred
Page 2

Please take the necessary corrective actions to bring your facility into compliance within 30 days of receipt of this letter and document the corrective actions to the Department via correspondence.

If there are any questions, please feel free to call me at (804) 225-3754.

Sincerely,

A handwritten signature in cursive script that reads "Glenn Moore".

Glenn Moore, Chemist
Division of Regulation

Enclosures

CC: Stuart Ashton, DWM

Jack Finnagan
Intermet Foundries, Inc.
P. O. Box 6200
Lynchburg, Va, 24505

APRIL 1990

CHECKLIST FOR RCRA INSPECTION OF TRANSPORTERS

Name of Facility: INTERMET FOUNDRIES, INC
Address: LFC-LOWER BASIN
P.O. BOX 6200 LYNCHBURG, VA. 24505
EPA Identification Number: VAD 000 8205142
Facility Representative: JACK FINNAGAN
Title: PROJECT ENGINEER
Telephone Number: (804) 528-8350
Inspector's Name: GLENN MOORE
Title: CHEMIST
Date of Inspection: 3/18/91

The questions in this checklist apply to transporters of hazardous waste shipments that originate and/or terminate within the Commonwealth.

VHWMR Ref.

- 7.A. 1. Does the company transport hazardous waste which:
- a. Originates within the Commonwealth? ☒ YES ☐ NO
 - b. Originates within another state or a foreign country? (If yes for foreign country, complete generator checklist for the company) YES ☒ NO
 - c. Terminates within the Commonwealth? ☒ YES ☐ NO
- 7.D.2. 2. Does the transporter mix hazardous wastes of different hazardous waste codes by placing them into a single container or tank? (If yes, complete generator checklist) YES ☒ NO

- 7.E.
7.3. 3. Does the transporter have a currently valid Virginia Hazardous Waste Transporter permit? Permit Number: VAD 000 820 547 ☒ YES ☐ NO
- 7.1.A.
7.5.A.2. 4. Does the transporter retain one signed copy of all manifests for at least three years from the date of acceptance? ☒ YES ☐ NO
- 7.1.F. 5. Has the transporter submitted an annual report for the preceding calendar year? ☒ YES ☐ NO
- 7.4.A. 6. Are all hazardous waste transport vehicles placarded in accordance with the applicable provisions of the Regulations Governing the Transportation of Hazardous Materials? ☒ YES ☐ NO
- 7.5. 7. Is the transporter currently employing a manifest system for all hazardous wastes accepted from generators? ☒ YES ☐ NO
- 7.5.A.2. 8. Has the transporter signed and dated each manifest acknowledging acceptance from the generator before transporting the waste? ☒ YES ☐ NO
- 7.5.A.1.
5.3.F.2 9. Is the following information included on the transporter's copy of each manifest:
- 5.3.B.1. a. The generator's name, address, telephone number and EPA ID number? ☒ YES ☐ NO
- 5.3.C. b. Generator's signature and date of release? ☒ YES ☐ NO
- 5.3.B.2. c. A unique five-digit manifest number assigned by the generator? ☒ YES ☐ NO
- 5.3.B.4. d. Transporter(s) name and EPA ID number? ☒ YES ☒ NO
↑ WRONG NAME
- 5.3.D. e. Printed transporter name, signature, and date of acceptance? ☒ YES ☐ NO
- 5.3.B.5. f. Name, site address, and EPA ID number of the facility designated to receive the waste? ☒ YES ☐ NO

g. Printed TSD representative's name, signature and date of acceptance?

☒ YES ☐ NO

5.3.B.6.

h. The U.S. DOT description of each waste to include its proper shipping name, hazard class, and ID Number (UN/NA) as identified in the Virginia Regulations Governing the Transportation of Hazardous Materials?

☒ YES ☐ NO

5.3.B.7.

i. The units of weight or volume and the type and number of containers as loaded into or onto the transporter's vehicle?

☒ YES ☐ NO

5.3.C.

j. The following certification: "I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled, and are in all respects in proper condition for transport by [mode of transportation] according to applicable international and national governmental regulations.

☒ YES ☐ NO

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to a degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford"?

7.6.F.

10. Does the transporter transport hazardous waste from generators of greater than 100 kg but less than 1000 kg of hazardous waste in a calendar month?

YES ☒ NO

If yes,

7.6.F.1.

a. Is the waste being transported pursuant to a reclamation agreement?

YES ☐ NO ☒ NA

- 7.6.F.2. b. Is the following information contained on a log or shipping paper for each shipment:
- 7.6.F.2.a - the name, address and EPA Identification Number of the generator of the waste? YES NO
- 7.6.F.2.b - the quantity of waste accepted? YES NO
- 7.6.F.2.c - all DOT required shipping information? YES NO
- 7.6.F.2.d - the date the waste is accepted? YES NO
- 7.6.F.4. c. Does the transporter retain these records for at least three years? YES NO
- 7.6.D. 11. For all wastes currently on-site which have been received by the transporter, has the generator met all applicable labeling, container and packaging requirements of VHWMR? YES NO
- 7.7.C.1. 12. Has the transporter had a hazardous waste spill which involved any of the following: a person being killed; a person receiving injuries requiring hospitalization; estimated carrier or other property damage exceeding \$50,000; fire, breakage, spillage or suspected radioactive contamination resulting from a spill of radioactive material; or a situation which is deemed by the transporter to otherwise cause danger to life? YES NO
- If yes,
- 7.7.C.2. a. Was a written report filed with the Department within 15 days of the incident? YES NO
- 7.8. 13. Has the transporter stored hazardous waste in containers or tanks for greater than ten days at the transfer facility? (If yes, fill out facility checklist) YES NO
- 13.3.E 14. Does the transporter act as a marketer of hazardous waste fuel? (If yes, complete the YES NO

Recyclable Materials Checklist)

13.3.D.

15. Does the transporter act as a marketer of used oil burned for energy recovery? (If yes, complete the Recyclable Materials Checklist)

YES ☒ NO

16. Comments:
